



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SEP 05 2017

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Timothy Boyd
Executive Director
East Norriton Plymouth Whitpain Joint Sewer Authority
200 Ross Street
Plymouth Meeting, Pennsylvania 19462

Re: Clean Air Act Opportunity to Confer
Existing Sewage Sludge Incinerator Requirements, 40 C.F.R. Part 62, Subpart LLL

Dear Mr. Boyd:

The U.S. Environmental Protection Agency, Region 3 ("EPA"), is providing this Opportunity to Confer to the East Norriton Plymouth Whitpain Joint Sewer Authority, located at 200 Ross Street, Plymouth Meeting, Pennsylvania 19426 ("ENPWJSA" or "the Facility"), concerning its compliance with the Clean Air Act, 42 U.S.C. §§ 7401-7671q ("CAA"). Specifically, EPA has concerns regarding ENPWJSA's compliance with the CAA requirements for sewage sludge incinerators ("SSIs") at wastewater treatment facilities that treat domestic sewage sludge, found at 40 C.F.R. Part 62, Subpart LLL ("Subpart LLL" also referred to as "the federal plan"). With this letter, we are providing ENPWJSA with information and an opportunity to meet with EPA to discuss the Facility's compliance efforts with Subpart LLL in advance of any formal action under the CAA.

EPA promulgated the federal plan requirements for the control of emissions from existing SSIs located in states that did not have an approved state plan in place by May 31, 2016, the effective date of the federal plan, under the authority of Section 111(d) and Section 129(b)(3) of the CAA, 42 U.S.C. §§ 7411(d) and 7429(b)(3). *See* 81 Fed. Reg. 26040 (April 29, 2016). The Commonwealth of Pennsylvania, through the Pennsylvania Department of Environmental Protection ("PADEP"), did not have an approved state plan in place to control emissions from SSIs by the May 31, 2016 effective date, therefore, the federal plan applies to your existing SSI unit. In August 2016, PADEP submitted to EPA a request for delegation of authority to implement the federal plan, which EPA currently is reviewing.

EPA believes ENPWJSA is subject to the federal plan (Subpart LLL) because it owns or operates a multi-hearth SSI unit at the Facility, which combusts sewage sludge for the purpose of reducing the volume of the sewage sludge by removing combustible matter; the SSI unit

commenced construction before October 14, 2010; and the SSI unit is not exempt from the federal plan under 40 C.F.R. § 62.15860. *See* 40 C.F.R. § 62.15855.

EPA would like to discuss ENPWJSA's compliance with the federal plan requirements, including but not limited to the following:

- a. submitting a final control plan and achieving final compliance (40 C.F.R. § 62.15875);
- b. developing and submitting a site-specific monitoring plan and conducting an initial performance evaluation (40 C.F.R. § 62.15995);
- c. conducting an initial inspection of air pollution control device(s) (40 C.F.R. § 62.15990);
- d. complying with the applicable emission limits specified in Table 3 (40 C.F.R. §§ 62.15955 and 62.16000);
- e. establishing and meeting the applicable operating limits and requirements provided in 40 C.F.R. § 62.15960;
- f. applying for and obtaining a title V operating permit for the Facility's existing SSI unit, in accordance with 40 C.F.R. §§ 62.16035 and 62.16040.

Please contact Kristen Hall, Environmental Scientist, at (215) 814-2168 or hall.kristen@epa.gov, or have your legal counsel contact Humane Zia, at (215) 814-3454 or zia.humane@epa.gov, within fourteen (14) days of your receipt of this letter, to schedule a meeting to discuss the above.

Sincerely,



Zelma Maldonado
Associate Director
Office of Air Enforcement and
Compliance Assistance

cc: Jim Rebarchak, PADEP Norristown
Susan Foster, PADEP Harrisburg
Human Zia, EPA Region 3, ORC (3RC10)